

COMMENTS: THOMES-NEWVILLE RESERVOIR

- ◆ The Service agrees that the special status plant and animal species mentioned in the Thomes-Newville Reservoir proposal warrant additional consideration before the project proceeds. Analysis of the potential effects of the project on each of these species is appropriate. Therefore, the Service recommends thorough and adequate biological surveys be conducted to determine the effects of the project on the species mentioned in the proposal as well as on the plant and animal species discussed below.
- ◆ The Service recommends that botanical surveys for federal species of concern be conducted well before any project construction efforts are undertaken. Federal species of concern include all listed, proposed, and candidate species as well as species of concern that have been identified in species lists that have been generated by the Sacramento Field Office. Botanical surveys need to be conducted as per Service protocols which are attached. Timing of botanical surveys is crucial to ensure that species are present and qualified botanists are able to make determinations to species (or subspecies) level.
- ◆ Because the proposal mentions that vernal pools were scattered through the project area in the past, the Service is concerned that the submitted proposal does not fully consider the potential effects of the project on federally listed vernal pool crustaceans: Conservancy fairy shrimp (*Branchinecta conservatio*), vernal pool fairy shrimp (*Branchinecta lynchi*), and vernal pool tadpole shrimp (*Lepidurus packardii*). Similarly, the proposal neglects to address other federally listed species known from the area including California red-legged frog (*Rana aurora draytonii*), giant garter snake (*Thamnophis gigas*), and valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*). Additional species of federal concern that are known from the area but that are not addressed in the proposal include northwestern pond turtle (*Clemmys marmorata marmorata*), foothill yellow-legged frog (*Rana boylei*), western spadefoot toad (*Scaphiopus hammondi*), and two anthicid beetles (*Anthicus antiochensis* and *Anthicus sacramento*).
- ◆ In reviewing the proposed projects that have been identified in the CALFED process, an adequate biological assessment of the impacts to any of the proposed projects needs to include an effects analysis. At a minimum, the effects analysis needs to include direct, indirect, and cumulative effects. Additionally, growth-inducing, interrelated and interdependent effects should be clearly and concisely described and analyzed in terms of what projects have been completed in the past, what other projects are proposed, and what the individual and collective effects of these projects are likely to be.